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**R-028-207.16**

**APPROVAL OF REMOVAL ACTION 17 WORK PLAN - REVISION 3**

**11/22/95**

**USEPA  
3  
APPROVAL**

**DOE-FN**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

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FERNALD

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REPLY TO THE ATTENTION OF:  
HSF-5J

Mr. Johnny W. Reising  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

RE: Approval of Removal Action 17  
Work Plan: Revision 3

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Removal Action (RA) 17 Work Plan, Revision 3.

This work plan revision addresses the management soil and debris consistent with the approved Record of Decisions. The work plan details management of soil and debris through construction of the on-site disposal cell.

U.S. EPA approves the RA 17 work plan revision, pending receipt of adequate responses to the attached comments. U.S. DOE must submit responses to comments on work plan revision within thirty (30) days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric, Remedial Project Manager  
Federal Facilities Section  
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO  
Jack Baublitz, U.S. DOE-HDQ  
Don Ofte, FERMCO  
Charles Little, FERMCO  
Terry Hagen, FERMCO  
Michael Yates, FERMCO



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## ENCLOSURE

TECHNICAL REVIEW COMMENTS ON THE  
REMOVAL ACTION 17 WORK PLAN  
FERNALD ENVIRONMENTAL MANAGEMENT PROJECT  
FERNALD, OHIO

## SPECIFIC COMMENTS

Commenting Organization: U.S. EPA                      Commentor: Saric  
Section #: 2.5                      Page #: 2-14                      Line #: 1 and 2  
Specific Comment #: 1

Comment: Temporary facilities may be constructed during remedial activities at the Fernald Environmental Management Project (FEMP). These temporary facilities may be considered temporary units (TU) under the Corrective Action Management Unit Rule (CAMU). FEMP should ensure that the design and use of these TUs complies with 40 Code of Federal Regulations (CFR) 264.553.

Commenting Organization: U.S. EPA                      Commentor: Saric  
Section #: 3.4.1                      Page #: 3-2                      Line #: 13 to 15  
Specific Comment #: 2

Comment: The location-specific applicable or relevant and appropriate requirements (ARAR) presented in Appendix B list three ARARs for threatened and endangered species. However, the text does not address these ARARs in the discussion of location restrictions for staging areas. This inconsistency should be resolved.

Commenting Organization: U.S. EPA                      Commentor: Saric  
Section #: Table 4-2                      Page #: 4-6                      Line #: N/A  
Specific Comment #: 3

Comment: This table summarizes the debris segregation approach. The storage configuration for nonregulated asbestos containing material (ACM) should be revised to state "stockpile/ containerize" to reflect the information presented in footnote 3 to the table.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: Figure 4-1 Page #: 4-7

Line #: N/A

Specific Comment #: 4

Comment: The figure presents the material flow chart for debris categories. The debris category titled "process-related metals" is not presented in the figure. The figure should be revised to include process-related metals.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: Section 4.4.3 Page #: 4-8

Line #: 22 to 24

Specific Comment #: 5

Comment: The text states that FEMP can treat stockpiled debris with an amended water spray to reduce airborne contaminant concentrations. The text should include an explanation of how the determination to treat the stockpiled debris will be made by FEMP.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 5.2.3

Page #: 5-2

Line #: 24 to 26

Specific Comment #: 6

Comment: The text states that the constituent of concern (COC) for Operable Unit (OU) 3 is technetium-99. However, review of Table 3-8 of the OU 3 remedial investigation/feasibility study (RI/FS) report indicates that other COCs exist, including uranium; thorium-230; barium; cadmium; chromium; lead; mercury; tetrachloroethene; 1,3-dichlorobenzene; hexachlorobutadiene; and nitrobenzene. The text should be revised to present a more thorough discussion of COCs for OU 3.